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Department of Energy

Rocky Flats Office

# memorandum

SEP 17 1993

ERD:BKT:10206

Environmental Protection Agency and Colorado Department of Health Comments on Standard Operating Procedures

Ned Hutchins, Acting Associate General Manager  
Environmental Restoration Management  
EG&G Rocky Flats, Inc.

Please find attached comments from the U.S. Environmental Protection Agency, Region VIII (EPA) and Colorado Department of Health (CDH) on Rocky Flats Plant (RFP) Standard Operating Procedures (SOPs) dated August 25 and 26, 1993, respectively. The CDH comments specifically address Surface Soil Sampling and Tank and Pipeline Investigation, but did not address either Receipt, Storage and Preservation of Soil Samples for Gamma Spectrometric Analysis or Analysis of Environmental Water and Soil Samples by Gamma Spectroscopy. Comments by EPA address Surface Soil Sampling; Receipt; Storage and Preservation of Soil Samples for Gamma Spectrometric Analysis; and Analysis of Environmental Water and Soil Samples for Gamma Spectroscopy, but did not address Tank and Pipeline Investigation. Thus, at the present time, the U.S. Department of Energy Rocky Flats Office (DOE/RFO) can only address EPA and CDH comments on the Surface Soil Sampling SOP.

You should note that EPA has stated that the "grab method" in Section 4.3 of the Surface Soil Sampling SOP should not be used until it is substantially improved. The CDH has granted conditional approval of the Surface Soil Sampling SOP provided that their comments are addressed in the final revision. We request that EG&G review the attached comments and determine whether they can be incorporated without scheduling a meeting with EPA and CDH. However, if additional information is needed we request that you contact Bruce Thatcher of my staff at extension 3532 so that a meeting can be arranged to close out the remaining issues. A revised Surface Soil Sampling SOP as well as written responses to comments should be submitted to DOE/RFO by October 1, 1993. Until the EPA and CDH comments are adequately incorporated into this SOP, DOE/RFO requests that EG&G not initiate any surface soil sampling. With regard to the "grab method", DOE/RFO requests that it not be used until we receive approval from EPA on the revised Section 4.3.

Upon receipt of EPA comments on the Tank and Pipeline Investigation and CDH comments on Receipt, Storage and Preservation of Soil Samples for Gamma Spectrometric Analyses, and Analysis of Environmental Water and Soil Samples by

ACTION Hutchins

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N. Hutchins  
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Gamma Spectroscopy, DOE/RFO will transmit these comments to EG&G for review, incorporation into the appropriate document and the preparation of written responses.

Questions or concerns should be addressed to Bruce Thatcher of my staff.

  
James K. Hartman  
Assistant Manager for Transition  
and Environmental Restoration

Attachment

cc w/ Attachment:  
M. McHugh, EG&G  
B. Peterman, EG&G

cc w/o Attachment:  
R. Schassburger, ERD, RFO  
S. Grace, ERD, RFO  
B. Birk, ERD, RFO  
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